

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 20 1998

In the Matter of

Telecommunications Relay Services)
and Speech-to-Speech Services for) CC Docket No. 98-67
Individuals with Hearing and Speech)
Disabilities)

COMMENTS OF SPRINT CORPORATION

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Summary

Sprint is deeply committed to providing high quality telecommunications relay services (“TRS”) to persons who are deaf, hard of hearing, deaf-blind, or speech disabled so that such individuals, consistent with the goal of the American with Disabilities Act of 1990, can be brought “into the mainstream of American society.”

Notice at ¶4. We therefore support the Commission’s tentative conclusions to require the provision of speech-to-speech (STS) TRS; to declare VRI an improved relay service and enable relay providers offering such service on a voluntary basis to be reimbursed from the interstate TRS Fund and from the States; and to clarify that multilingual relay service is a TRS service which is eligible for reimbursement from TRS funds. On the other hand, Sprint believes that the Commission’s tentative view that an outgoing TRS provider in a particular State must disclose what is customer proprietary network information to a new TRS vendor should not be adopted, since it jeopardizes the privacy interests of TRS users and compromises the intellectual property rights of TRS vendors. Sprint also believes that neither STS nor VRI should be subject to the minimum operational standards applicable to standard telecommunications relay services, and that the Commission should not, at this time, adopt its proposed minimum standards for handling emergency calls by TRS. Finally, Sprint proposes that speed-of-answer be measured as the difference between the time a call arrives at the TRS provider’s switch and the time the call is answered by a Communications Assistant, minus any time that the call was attached to an automated agent, or to a system that is used to gather called number or other information, and that such calculations be performed on a monthly basis.

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COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") hereby respectfully submits its Comments on the *Notice of Proposed Rulemaking* ("Notice"), FCC 98-90, released May 20, 1998 in the above-captioned proceeding.

I. INTRODUCTION.

Sprint is deeply committed to providing high quality telecommunications relay services ("TRS") to persons who are deaf, hard of hearing, deaf-blind, or speech disabled in order that such individuals, "consistent with the goal of the American with Disabilities Act of 1990," can be brought "into the mainstream of American society." *Notice* at ¶4. Because of this commitment as well as its sensitivity to the needs of individuals with hearing or speech disabilities, Sprint has become the Nation's leading TRS provider. In 1997, Sprint processed more than 12.4 million calls totaling more than 76.8 million conversation minutes with a service reliability of 99.6 percent. It has been selected by 22 States to operate their TRS; it offers TRS to California citizens under that State's multi-vendor program; and it is the TRS provider for the federal government through the Federal Information Relay Service.

Since 1990, when Sprint first entered the TRS market, Sprint has been in the forefront in implementing new cost-effective TRS technologies and services. For example, Sprint has developed a unique TRS customer database system that enables it to provide services similar to those offered by the LECs (speed dialing, preferred carrier of choice, blocked calls, etc.), and facilitates call set-up and completion and reduces call time. Sprint also employs Communications Assistants (CAs) conversant in both English and Spanish for its Federal Information Relay Service account and in 18 of its State accounts (in all 18 of these States, Sprint provides Spanish-to-Spanish TRS, and in 8 of those 18 States: Sprint provides Spanish-to-English TRS as well). Sprint provides TTY operator services enabling TTY users to receive the same types of operator services that persons in the hearing community take for granted, *e.g.*, operator-assisted calls virtually anywhere in the world: the ability to place collect, person-to-person, and billed to third party calls; directory assistance; etc. Sprint is providing speech-to-speech ("STS") relay services in each of its States that have requested such services, *i.e.*, Maryland, South Carolina, Missouri, California¹ and Arizona (to begin in August 1998). And, Sprint is continuing to explore ways to offer video relay interpreting ("VRI") services at a reasonable cost.

The Commission explains that the *Notice* represents its continuing effort to implement its statutory mandate to ensure that its "TRS regulations do not artificially suppress or impair the development of TRS in a changing dynamic telecommunications landscape." *Notice* at ¶18. Sprint endorses such effort. It agrees that the Commission must seek to bring about "direct and tangible improvements in the quality of TRS." *id.* at ¶5, and enable "persons with hearing and speech disabilities [to] benefit from technological advances." *Id.* at ¶18. But, at the same time, the

¹Sprint formerly provided S'TS in Missouri and California on a trial basis.

Commission must refrain from prescribing changes in the provision of relay services that will be extremely costly for carriers to implement and be of only marginal benefit to TRS users. If carriers are required to expend significant resources in attempting to comply with newly prescribed standards for TRS that are of only marginal utility, they may be unwilling -- or perhaps unable -- to devote any resources to the development of innovative technologies that may hold greater promise for those with hearing and speech impairments to fully "participat[e] in our increasingly telecommunications and information-oriented society." *Id.* at ¶2. Moreover, to the extent that the Commission does mandate provision of any new services: Sprint recommends that such services comport: with industry standards and be based on non-proprietary technology.

Sprint believes that many of the Commission's tentative conclusions strike a reasonable balance between the goal of allowing persons in the hearing or speech-impaired communities to benefit from advancing technology without severely impeding any TRS provider's ability or incentive to develop additional innovative technologies for the TRS market. Certainly the Commission's tentative conclusions to require the provision of STS; to declare VRJ an improved relay service and enable relay providers offering such service on a voluntary basis to be reimbursed from the interstate TRS Fund and from the States; and to clarify that multilingual relay service ("MRS") is a TRS service which must be provided if the State so determines. "will enhance the quality of TRS." *Notice* at ¶2. On the other hand, some of the Commission's proposals -- particularly its tentative view that an outgoing TRS provider in a particular State disclose what is customer proprietary network information to a new TRS vendor --jeopardize the privacy interests that are afforded to those in the hearing and non-speech-impaired communities.

Sprint's positions on these proposals and on other issues raised in the *Notice* are discussed in detail below. Sprint's discussion tracks the way the issues are set forth in the *Notice*.

II. DISCUSSION.

A. **Sprint Agrees That The Definition of TRS Needs To Be Changed To Better Reflect The Types Of Services Which Are Being Offered And Which May Be Offered In the Future By Relay Providers.**

The Commission's current TRS rules apply only to relay communications in which one of the parties to the call is using a TTY, *i.e.*, TTY-to-speech and speech-to-TTY. *Notice* at 10. Yet, TRS providers today offer a number of services that do not fit the traditional TTY-based model. Sprint, for example, in response to demand from TRS users, offers voice carryover ("VCO") and hearing carryover ("HCO") services in which a TTY may not be used. *i. e.*, VCO-VCO, VCO-HCO, and HCO-HCO.² As stated above, Sprint also offers STS in some of its States and is continuing to explore ways to provide VRI on a cost-effective basis. Neither STS nor VRI involves the use of a TTY.

Plainly, such non-TTY-dependent services are encompassed in the statutory definition of TRS as set forth in "Title IV of the Americans with Disabilities Act of 1990 ("AD, "). Like the traditional TTY/speech service model, they "enable[] persons with hearing or speech disabilities to engage in communications with persons without such disabilities." *Notice* at ¶14. Thus, Sprint agrees with the Commission that its regulation of TRS needs "to expand beyond traditional TTY relay service." It must be broad enough to encompass the non-TTY-based services currently being offered in the market as well as services using even newer and more advanced technologies that may be deployed in the future. Sprint believes that the Commission's proposed Section 64.601(8) is sufficient to meet this goal.

²As required by the Rules, Sprint also offers VCO and HCO services which involve the use of a TTY, *i.e.*, VCO-TTY and HCO-TTY. *See Notice* at fn. 36.

Sprint also supports the Commission's tentative conclusion to classify STS and VRI as "improved" telecommunications relay services, and thereby render the costs of providing such services recoverable from the TRS funds. As the Commission recognizes, such services are currently being deployed in the marketplace, and hold great promise for bringing individuals with hearing and speech impairments who are either unable or unwilling to utilize a traditional TTY-based TRS service into the TRS market.

Under the Commission's proposal, STS would become a mandatory telecommunications relay service while the provision of VRI would remain voluntary. Sprint agrees with the Commission's approach here. The technology for providing STS is at a point where STS can and should be deployed by all TRS providers with relative ease and rapidity. In fact, given the benefits STS provides to those with speech impairments, Sprint believes that carriers and TRS providers should be required to implement the service in half the time proposed by the Commission, i.e., in one year rather than two.³ On the other hand, because the technology and human resources that would enable carriers and TRS providers to deploy a ubiquitous VRI service on a cost-effective basis do not now exist, mandatory provision of VRI is not warranted. *See Notice* at ¶¶32-34.

In addition to designating STS and VRI as improved telecommunications relay services eligible for reimbursement, Sprint requests that the Commission declare that 900 pay per call services be designated as an improved -- but not mandatory -- relay service. Sprint offers access to such services at its relay center in nine states, thereby providing relay users in that State the opportunity to more fully participate in today's telecommunications and information-based

³As the Commission recognizes (*Notice* at ¶7), STS operates differently from a TTY-based TRS service and will require different minimum performance standards (see Sprint Section II.D below).

society. In fact, the availability of 900 pay-per-call services has proven to be very popular. The volume of calls has increased over 3300 percent, growing from 5 calls per month when the service was first offered in July 1996 to 172 calls per month in June 1998.

B. The Costs of Providing Services Based On Newer Technologies Should Be Eligible For Reimbursement.

If the Commission adopts its tentative conclusion to expand the definition of TRS -- as it should -- it will need to ensure that the costs of providing the newer telecommunications relay services that will now be included within such definition are eligible for reimbursement from the interstate TRS fund as well as from state funds. Of course, a TRS provider like Sprint will devote resources to develop new, improved telecommunications relay services in order to differentiate its product in the marketplace and thereby make itself a more attractive candidate to win the competitive bidding process conducted by various the States to operate their TRS. However, Sprint would be reluctant to offer costly new services or features in a particular State unless the State is willing to fund the reasonable costs of providing such services. Likewise, Sprint should not be required to provide these improved services on an interstate basis if it cannot recover its costs from the interstate TRS Fund.

For this reason, Sprint strongly endorses the Commission's tentative conclusion that "TRS providers should be able to receive reimbursement for providing intrastate or interstate improved relay services regardless of whether they provide the service voluntarily or the provision of the service is required by the Commission's or a certified State's TRS rules." Notice at ¶15. Sprint recognizes that in order to control the process by which a new service becomes eligible for reimbursement, the Commission will need to decide on a case-by-case basis whether a particular TRS offering is, in fact, an "improved relay service." But, Sprint believes that adoption of the Commission's tentative conclusion here is required by the Commission's

mandate under Section 225 to encourage "the implementation of improved TRS."⁴ *Notice* at 1115.

Under the Commission's proposal for designating a particular offering as an improved relay service, a service will be eligible for reimbursement even if service providers are not required to offer such service. The Commission proposal here is "based on, and consistent with, our statutory duty not to discourage the implementation of improved TRS." *Notice* at 8. Similarly, providing for reimbursement for all 900 pay-per-call services that are voluntarily offered by carriers and TRS providers will encourage the provision of such services. This is a long-standing Commission goal, *Notice* at ¶43, and thus more persons with hearing or speech impairments will receive access to services that are increasingly being used by businesses and information providers throughout the United States.

c. The Definition Of A Communications Assistant Must Be Modified.

Currently, a CA is defined under the Commission's Rules as a "person who transliterates conversation from text to voice and from voice to text between two end users of TRS." 47 C.F.R. §64.601(5). With the addition of non-TTY based services to TRS, this definition must be revised to reflect the broader activities of CAs in the provision of such services. Thus, Sprint supports the Commission's proposal to amend the definition of CA by deleting the words "from text to voice and from voice to text." *Notice* at ¶18.

D. STS Should Be A Required TRS But Not Subject to Minimum TRS Standards At This Time.

As noted above, Sprint supports the Commission's tentative conclusion that STS -- a TRS product which enables a moderately speech-disabled person to use TRS with his or her own

⁴Sprint also agrees with the Commission that it may need special guidelines for the reimbursement of improved telecommunications relay services and that such guidelines should

voice or a voice synthesizer rather than using a TTY' -- should be a mandatory TRS service. However, Sprint does not believe that STS should be subject to the Commission's existing minimum TRS standards (§26), for two reasons. First, there is as yet no consensus on what constitutes a "moderate" speech disability. Until STS can be defined, minimum operational standards cannot be established.

Second, there are significant differences between STS and standard relay service. For example, the call set-up and call delivery times are at least three times longer for STS than for standard relay calls; the procedures for relaying STS communications differ from standard relay communications; a qualified STS agent must have additional, more specialized training than that of a qualified CA; and STS services offered to date support only a small fraction of persons with speech disabilities." Because of these differences, it is unreasonable to apply the same minimum operational standards (especially those such as speed of service which are largely a function of volume and talk time) for STS as apply to standard TRS.

E. VRI Services Should Be A Voluntary TRS Not Subject to Minimum TRS Standards.

As the Commission has correctly recognized (§32), the technology used to provide VRI services "is still at a relatively early stage of development, and the costs to implement this service on a nationwide basis appear to be prohibitive." Therefore, provision of VRI services

be adopted, in the first instance, by the Interstate TRS Fund Advisory Council. *Notice* at ¶16.

⁵ STS will provide trained CAs to serve as human translators for people with speech disabilities who have trouble being understood on the telephone. The STS CA will repeat the words of the speech-disabled caller (as speech interpreters do in a face-to-face setting) to whomever the person with the speech disability is calling. The service also works in reverse, so that the "speech-abled" user may call the speech-disabled person through the TRS STS product.

⁶ Sprint has forecasted a combined call volume of less than 500 STS calls per day for all states in which Sprint provides relay service.

should be voluntary, and where VRI services are offered, they should not be subject to any minimum TRS service standards.

The Commission has also noted that VRI users should be protected against communications errors caused by the use of unqualified interpreters, and has tentatively decided to revise its rules to incorporate the Dept. of Justice's definition of "qualified interpreter" (§34). Sprint recommends that rather than adopting the Dept. of Justice's definition, the Commission's rules should instead defer to the States to determine minimum qualifications for interpreters. Sprint further recommends that States adopt the Registry Interpreters of the Deaf's and/or the National Association of the Deaf's (NAD) national certification standards, and that VRI interpreters be required to undergo a VRI training program which meets the minimum TRS Communications Assistants standards (with the exception of the minimum typing speed qualification). Sprint recommends that VRI interpreters have the following qualifications:

- Minimum 3 years of experience at interpreting;
- Function as TRS Communications Assistant;
- Certified NAD Level III, IV or V, or RID Level IC/TC, CI/CT, CSC, LSC;
- Be sensitive to the cultural needs of VRI users and standard voice users;
- Have aptitude for use of computer and video equipment.

F. Multilingual and Translation Services Are Relay Services Eligible for Reimbursement from the TRS Funds.

Sprint supports the Commission's tentative conclusion (§38) that multilingual relay services (MRS) are a telecommunications relay service, and that the costs of providing MRS should be recoverable from the interstate and/or intrastate TRS funds. However, the Commission should treat both same-language (*e.g.*, Spanish to Spanish) and different-language (*e.g.*, Spanish to English) interpretation as TRS eligible for reimbursement. In some cases,

different-language translation is the only means of communication available to non-English speaking callers.

On the other hand, Sprint recommends that ASL translation not be considered a feature of telecommunications relay service. ASL is primarily a visual language, and cannot be truly “translated” in a text environment through relay. ASL interpreters can provide substantial support to CAs to minimize the risk of misunderstanding or CA error. However, TKS providers should provide ASL interpreter support to CAs only upon customer request (because of the potential liability associated with providing anything other than a verbatim translation), and only subject to higher per minute pricing (because of the expense of employing highly trained and skilled ASL interpreters).’

G. The Commission Should Not Adopt The Proposed Minimum Standards For Handling Emergency Calls By TRS.

It is clear that emergency services must be made available to TTY users. However, the Commission should not adopt the proposed minimum standards for handling emergency calls by TRS centers, such as passing a caller’s ANI to an emergency services operator. Such a requirement is extremely costly to implement, particularly for smaller TRS providers whose switching infrastructure supporting TRS may not be able to accommodate the types of trunking required to provide ANI delivery to the emergency services operator. Moreover, TRS is not equipped to provide ANI delivery if the caller disconnects before the emergency services operator answers the call from the TRS center.

Nonetheless, because of the public safety concerns here, Sprint does believe that the industry should explore the possibility of integrating TRS with existing E-9 11 mechanisms, in

⁷ Sprint would note that a visual service such as VRI is a more logical solution for facilitating communications between English and ASL speakers.

Texas, the industry is studying the feasibility of establishing a single, state-wide routing database which contains the telephone number for the emergency provider associated with the caller's ANI. Inclusion of the TRS provider in the implementation of a solution of this type provides consistent 911 service access whether through TRS or direct.

H. Access to Enhanced and Pay-Per-Call Services Should Not Be Mandated.

The Commission has tentatively concluded that Title IV of the ADA does not permit it to mandate access to enhanced services (§45). Sprint agrees. Access to menu-driven systems is the responsibility of the system vendor and the system owner/operator, not the TRS provider. However, the Commission should encourage system vendors and owner/operators to deploy the functionality needed to provide improved interaction with TRS, e.g., to configure their systems with longer response time limits and to implement a "TRS mode" (a trigger enabled by a qualified user to eliminate or increase response time limits).

Sprint does provide access to 900-based pay-per-call services. However, it is not possible today to provide 976 pay-per-call services through TRS since the LECs' current network architecture allows the provision of such services only on a calling area basis. Moreover, billing and rating systems for 976 calls are not extendable to TRS providers. Given the technical and administrative impediments here, the Commission should not require TRS vendors to provide mandatory access to all pay-per-call services.

I. Speed-of-Answer Requirements Should Not Bar Use of Automated Agents, and Should Be Administratively Reasonable.

The Commission has tentatively concluded that it should revise its speed-of-answer rules to require TRS providers to answer 85% of all calls within 10 seconds by a CA prepared to place the TRS call at that time (§50). This proposed rule change should not be adopted, since it effectively eliminates use of automated agents, which can be used to speed up the relay process

by permitting the call set-up information to be gathered without the use of a CA. Furthermore, the proposed rule makes it difficult for a relay provider that does not maintain its own network to compile data, since the trigger event takes place on a network or networks that are not under the control of the TRS provider. Sprint proposes instead that speed-of-answer be measured as the difference between the time a call arrives at the TRS provider's switch and the time the call is answered by a CA, minus any time that the call was attached to an automated agent, or to a system that is used to gather called number or other information.

Sprint would note that most, if not all, current TRS providers have deployed intelligent network (IN) technology, and that IN provides routing to the relay platform within the network in milliseconds (less than $\frac{1}{4}$ of a second). Because network delays do not contribute significantly to total call set-up time, the Commission should avoid any speed-of-response requirement which focuses excessively on network delays.

The Commission has also proposed that speed-of-answer calculation be made on a daily basis (§50). Sprint believes that daily calculations are burdensome, do not accurately reflect functionally equivalent access (operator service providers, for example, calculate response times on the basis of monthly results), and ignore the fact that daily traffic patterns are not always predictable." Sprint recommends instead that such calculations be made on a monthly basis. While monthly figures do smooth out daily highs and lows, we believe that competitive pressures will provide powerful incentive to TRS providers to provide consistent, rapid service.

⁸ For example, customer calling patterns may vary significantly from day to day due to special events, weather conditions, network problems (including problems in the LEC networks), and current events.

J. CA Quality and Training.

Sprint agrees with the Commission that “clear and articulate voice communication is an essential skill for any CA” (§59). However, because of the subjective nature of “clear and articulate voice communications,” the Commission should not attempt at this time to establish standards for this skill.

K. Confidential TRS Customer Information Should Not Be Shared With Other TRS Providers.

The Commission has sought comment on whether the disclosure by an outgoing TRS provider of customer information to a new TRS vendor is subject to section 222 of the Act and the Commission’s implementing regulations, and specifically, whether information compiled by TRS providers constitutes CPNI under section 222 (§72).⁹ As explained below, Sprint’s TRS customer database is CPNI and its contents therefore may not be automatically transferred to a successor TRS vendor. Furthermore, the databases are proprietary resources that were developed at significant expense by Sprint; the ANI database is a copyrightable work and a trade secret, and the forced sharing of such a resource with a competitor is clearly unreasonable.

Sprint’s TRS database consists of an ANI database and a Customer Profile database. The ANI database is a software-driven functionality that enables Sprint to automatically brand an incoming call (based on prior usage) before it is transmitted to the CA as a VCO, TTY, HCO, Voice, Deaf-Blind, Spanish or ASCII call. The branding facilitates call set-up and completion (the CA is able to automatically connect with the caller in the desired method)? and reduces call

⁹ Section 222(f)(1) of the Act defines CPNI as:

(A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and

time. Information included in the ANI database is gathered before commencement of billing for the call.

Sprint's Customer Profile database contains information such as the customer's preferred IXC, a list of frequently dialed numbers, and preferred service type (*e.g.*, voice carryover without typing). There can be no doubt that data contained in both the ANI database and the Customer Profile database is confidential and falls within the statutory definition of CPNI. None of this data is necessary to "initiate, render, bill and collect" (Section 222(d)(1)) for the relay service; therefore, there is no basis for the Commission or any State entity to require the sharing of Sprint's ANI and Customer Profile database with another TRS provider.

The Commission has also requested comment on whether disclosure of all customer information by the outgoing TRS provider to the new TRS vendor is required under Title IV of the ADA (§72). The answer is clearly no. To argue otherwise would put the ADA in direct conflict with other statutes that protect the intellectual property rights of TRS vendors and the privacy interests of TRS users.

L. Enforcement and Certification Issues.

The Commission has tentatively concluded that its certification rules should be amended to require states to notify the Commission of substantive changes in their state TRS programs within 60 days and to demonstrate that the programs remain in compliance with the Commission's mandatory minimum standards (§75). Sprint agrees with this tentative conclusion and believes that the proposed rule amendment will help the Commission "ensure that interstate and intrastate telecommunications relay services are available, to the extent possible and in the

(B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

most efficient manner, to hearing-impaired and speech-impaired individuals in the United States” (Section 225(b)(2)).

Sprint does not believe that the Commission’s rules need to be modified regarding referral of complaints to certified states and Commission action on TRS complaints (§76). Sprint routinely provides information to relay users in printed materials and public outreach forums on how to contact relay customer service, the state consumer advisory council and the certified state contract administrator with comments, questions or complaints about the relay service. Sprint has received less than one customer contact per 1000 relay calls. The majority of these contacts are addressed within Sprint within 24-72 hours, depending on the nature of the contact. Fewer than one contact per 1,000,000 relay calls cannot be resolved between Sprint and the relay customer and results in a referral to the certified state contract administrator for action at a consumer advisory committee or state oversight level. The majority of these referrals are addressed within 90 days as a result of the meeting cycles of consumer advisory programs.

Respectfully submitted.

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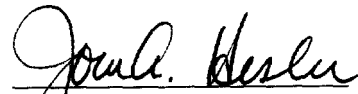
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 20th day of July, 1998 to the below-listed parties:

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